



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL MENDIOLA,
aka "Pollo,"
RAUL NARCISO ALBA-DELGADO,
aka "Chevy," and
OSCAR GARCIA,

Defendants.

CR No. 2:25-cr-00191-FMO

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), (b)(1)(B)(viii):
Distribution of and Possession
with Intent to Distribute
Methamphetamine; 18 U.S.C.
§ 922(g)(5): Alien in Possession
of a Firearm; 18 U.S.C.
§ 922(a)(1)(A): Engaging in the
Business of Dealing in Firearms
Without a License;
18 U.S.C. § 922(g)(1): Felon in
Possession of Firearms and
Ammunition; 26 U.S.C. § 5861(d):
Possession of an Unregistered
Short-Barreled Rifle; 26 U.S.C.
§ 5861(i): Possession of a Firearm
Not Identified by a Serial Number;
18 U.S.C. § 922(o)(1): Possession
of a Machinegun; 18 U.S.C. § 924,
21 U.S.C. § 853, 26 U.S.C. § 5872,
28 U.S.C. § 2461(c): Criminal
Forfeiture]

1 The Grand Jury charges:

2 COUNT ONE

3 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2(a)]

4 [DEFENDANTS ALBA-DELGADO and GARCIA]

5 On or about April 12, 2024, in Los Angeles County, within the
6 Central District of California, defendants RAUL NARCISO ALBA-DELGADO,
7 also known as "Chevy," and OSCAR GARCIA, each aiding and abetting the
8 other, knowingly and intentionally distributed at least five grams,
9 that is, approximately 27.9 grams, of methamphetamine, a Schedule II
10 controlled substance.

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1 COUNT TWO

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 [DEFENDANT ALBA-DELGADO]

4 On or about May 2, 2024, in Los Angeles County, within the
5 Central District of California, defendant RAUL NARCISO ALBA-DELGADO,
6 also known as "Chevy," and an unidentified co-conspirator, each
7 aiding and abetting the other, knowingly and intentionally
8 distributed at least 50 grams, that is, approximately 109.4 grams, of
9 methamphetamine, a Schedule II controlled substance.

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1 COUNT THREE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

3 [DEFENDANT MENDIOLA]

4 On or about July 17, 2024, in Los Angeles County, within the
5 Central District of California, defendant DANIEL MENDIOLA, also known
6 as "Pollo," knowingly and intentionally distributed at least 50
7 grams, that is, approximately 889.8 grams, of methamphetamine, a
8 Schedule II controlled substance.

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1 COUNT FOUR

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

3 [DEFENDANT MENDIOLA]

4 On or about July 23, 2024, in Los Angeles County, within the
5 Central District of California, defendant DANIEL MENDIOLA, also known
6 as "Pollo," knowingly and intentionally distributed at least 50
7 grams, that is, approximately 442.5 grams, of methamphetamine, a
8 Schedule II controlled substance.

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1 COUNT FIVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

3 [DEFENDANT MENDIOLA]

4 On or about August 15, 2024, in Los Angeles County, within the
5 Central District of California, defendant DANIEL MENDIOLA, also known
6 as "Pollo," knowingly and intentionally distributed at least 50
7 grams, that is, approximately 435.1 grams, of methamphetamine, a
8 Schedule II controlled substance.

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1 COUNT SIX

2 [18 U.S.C. § 922(g)(5)]

3 [DEFENDANT ALBA-DELGADO]

4 On or about July 11, 2024, in Los Angeles County, within the
5 Central District of California, defendant ALBA-DELGADO, who was then
6 an alien illegally and unlawfully in the United States, knowingly
7 possessed a firearm, namely, a Taurus Model 86, .38 caliber revolver
8 bearing serial number 720135 in and affecting interstate and foreign
9 commerce.

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1 COUNT SEVEN

2 [18 U.S.C. § 922(a)(1)(A)]

3 [DEFENDANT MENDIOLA]

4 Beginning on or about August 7, 2024, and continuing to at least
5 on or about August 15, 2024, in Los Angeles County, within the
6 Central District of California, and elsewhere, defendant DANIEL
7 MENDIOLA, also known as "Pollo," not being a licensed importer,
8 manufacturer, or dealer of firearms, willfully engaged in the
9 business of dealing in firearms, specifically, the sales of the
10 following firearms, on or about the following dates:

DATE	FIREARMS
August 7, 2024	HI-Point Firearm, model C9, 9mm caliber, semi-automatic pistol, bearing serial number P1659137
August 9, 2024	(1) A Glock-type, .40 S&W caliber unserialized firearm (commonly referred to as a "ghost gun"); and (2) An AR-type, 9mm Luger caliber unserialized rifle with a barrel less than sixteen inches in length
August 15, 2024	(1) Armscor, model M1911 A1-CS, .45 caliber semi-automatic pistol, bearing serial number RIA2414092; and (2) ROHM, model RG6, revolver with unknown caliber and unknown serial number

1 COUNTS EIGHT THROUGH TEN

2 [18 U.S.C. § 922(g)(1)]

3 [DEFENDANT MENDIOLA]

4 On or about the following dates, in Los Angeles County, within
 5 the Central District of California, defendant DANIEL MENDIOLA, also
 6 known as "Pollo," knowingly possessed the following firearms and
 7 ammunition, each in and affecting interstate and foreign commerce:

COUNT	DATE	FIREARM(S) AND AMMUNITION
EIGHT	August 7, 2024	(1) HI-Point Firearm, model C9, 9mm caliber, semi-automatic pistol, bearing serial number P1659137; and (2) Eight rounds of Hornady 9mm Luger caliber ammunition
NINE	August 9, 2024	(1) Two rounds of Hornady .40 S&W caliber ammunition; (2) Two rounds of Federal .40 S&W caliber ammunition; (3) Four rounds of Blazer .40 S&W caliber ammunition; and (4) One round of Winchester .40 ACP caliber ammunition
TEN	August 15, 2024	(1) Armscor, model M1911 A1-CS, .45 caliber semi-automatic pistol, bearing serial number RIA2414092; (2) ROHM, model RG6, revolver with unknown caliber and unknown serial number; (3) 29 rounds of Winchester .45 ACP caliber ammunition; and (4) Five rounds of G.F.L 6.35mm caliber ammunition;

26 Defendant MENDIOLA possessed such firearms and ammunition
 27 knowing that he had previously been convicted of a felony crime,
 28 punishable by a term of imprisonment exceeding one year, namely,

1 Possession with Intent to Distribute a Controlled Substance, in
2 violation of Utah Code Section 58-37-1(1)(a)(iii), in the Fifth
3 District Court - Cedar, Iron County, State of Utah, Case No.
4 211500308, on or about October 20, 2021.

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1 COUNT ELEVEN

2 [18 U.S.C. § 922(o)(1)]

3 [DEFENDANT MENDIOLA]

4 On or about August 9, 2024, in Los Angeles County, within the
5 Central District of California, defendant DANIEL MENDIOLA, also known
6 as "Pollo," knowingly possessed a machinegun, as defined in Title 18,
7 United States Code, Section 921(a)(24), and Title 26, United States
8 Code, Section 5845(b), namely, a Glock-type .40 S&W caliber firearm
9 that lacked a serial number (commonly referred to as a "ghost gun"),
10 equipped with a machinegun conversion device (also known as a "Glock
11 switch, "trigger switch," "auto switch," or "auto sear") that was
12 designed and intended, solely and exclusively, for use in converting
13 a weapon into a machinegun, and which defendant MENDIOLA knew to be a
14 machinegun.

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1 COUNT TWELVE

2 [26 U.S.C. § 5861(d)]

3 [DEFENDANT MENDIOLA]

4 On or about August 9, 2024, in Los Angeles County, within the
5 Central District of California, defendant DANIEL MENDIOLA, also known
6 as "Pollo," knowingly possessed a firearm, namely, a privately
7 manufactured AR-type rifle, with a barrel less than sixteen inches in
8 length, bearing no serial number, which defendant MENDIOLA knew to be
9 a firearm and a short-barreled rifle, as defined in Title 26, United
10 States Code, Sections 5845(a)(3) and 5845(c), and which had not been
11 registered to defendant MENDIOLA in the National Firearms
12 Registration and Transfer Record, as required by Title 26, United
13 States Code, Chapter 53.

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1 COUNT THIRTEEN

2 [26 U.S.C. § 5861(i)]

3 [DEFENDANT MENDIOLA]

4 On or about August 9, 2024, in Los Angeles County, within the
5 Central District of California, defendant DANIEL MENDIOLA, also known
6 as "Pollo," knowingly possessed a firearm, namely, a privately
7 manufactured AR-type style rifle, with a barrel less than sixteen
8 inches in length, which defendant MENDIOLA knew to be a firearm and
9 short-barreled rifle, as defined in Title 26, United States Code,
10 Sections 5845(a)(2) and 5845(d), and which was not identified by a
11 serial number, as required by Title 26, United States Code, Chapter
12 53.

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1 FORFEITURE ALLEGATION ONE

2 [21 U.S.C. § 853]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853 and Title 28, in the event of any
7 defendant's conviction of the offenses set forth in any of Counts One
8 through Five of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, constituting or derived from, any proceeds which
13 the defendant obtained, directly or indirectly, from any such
14 offense;

15 (b) All right, title and interest in any and all property,
16 real or personal, used, or intended to be used, in any manner or
17 part, to commit, or to facilitate the commission of any such offense;
18 and

19 (c) To the extent such property is not available for
20 forfeiture, a sum of money equal to the total value of the property
21 described in subparagraphs (a) and (b).

22 3. Pursuant to Title 21, United States Code, Section 853(p),
23 any defendant so convicted shall forfeit substitute property if, by
24 any act or omission of the defendant, the property described in the
25 preceding paragraph, or any portion thereof: (a) cannot be located
26 upon the exercise of due diligence;

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1 (b) has been transferred, sold to, or deposited with a third party;
2 (c) has been placed beyond the jurisdiction of the court; (d) has
3 been substantially diminished in value; or (e) has been commingled
4 with other property that cannot be divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 924(d)(1), and Title 28, United States
7 Code, Section 2461(c), in the event of any defendant's conviction of
8 the offenses set forth in any of Counts Six through Eleven of this
9 Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title, and interest in any firearm or
13 ammunition involved in or used in such offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 28, United States Code, Section 2461(c), any
19 defendant so convicted, shall forfeit substitute property, up to the
20 value of the property described in the preceding paragraph if, as the
21 result of any act or omission of the defendant, the property
22 described in the preceding paragraph or any portion thereof (a)
23 cannot be located upon the exercise of due diligence; (b) has been
24 transferred, sold to, or deposited with a third party; (c) has been
25 placed beyond the jurisdiction of the court; (d) has been
26 substantially diminished in value; or (e) has been commingled with
27 other property that cannot be divided without difficulty.

1 FORFEITURE ALLEGATION THREE

2 [26 U.S.C. § 5872, and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 26,
6 United States Code, Section 5872 and Title 28, United States Code,
7 Section 2461(c), in the event of any defendant's conviction of the
8 offenses set forth in any of Counts Twelve or Thirteen of this
9 Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title, and interest in any firearm involved
13 in any such offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 28, United States Code, Section 2461(c), any
19 defendant so convicted shall forfeit substitute property, up to the
20 value of the property described in the preceding paragraph if, as the
21 result of any act or omission of the defendant, the property
22 described in the preceding paragraph or any portion thereof

23 (a) cannot be located upon the exercise of due diligence; (b) has
24 been transferred, sold to, or deposited with a third party;

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1 (c) has been placed beyond the jurisdiction of the court; (d) has
2 been substantially diminished in value; or (e) has been commingled
3 with other property that cannot be divided without difficulty

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5 A TRUE BILL

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7 /S/
8 Foreperson

9 JOSEPH T. MCNALLY
10 Acting United States Attorney

11 LINDSEY GREER DOTSON
12 Assistant United States Attorney
Chief, Criminal Division

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14 FRANCES S. LEWIS
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Chief, General Crimes Section

16 SHAWN T. ANDREWS
17 Assistant United States Attorney
Deputy Chief, General Crimes
Section

18 ALEXANDRA MICHAEL
19 Assistant United States Attorney
Major Frauds Section

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